

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:  
Pamela Denise Jonjo aka Pamela D. Jonjo aka Pamela  
Jonjo

CHAPTER 13  
CASE NO.: 21-13083

**Debtor**

Village Capital & Investment, LLC

**Movant**

vs.

Pamela Denise Jonjo aka Pamela D. Jonjo aka Pamela  
Jonjo

**Debtor**

Brenda L. Vaxter and Gena Mayers

**Co-Debtors**

Scott F. Waterman

**Trustee**

**ANSWER TO MOTION FOR RELIEF  
ON BEHALF OF DEBTOR**

AND NOW comes the Debtor, Pamela Denise Jonjo, by and through her attorneys, and answers the Motion for Relief from Automatic Stay by Village Capital & Investment, LLC, as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Denied. After reasonable investigation, Debtor is without information sufficient to respond to this averment.
6. Denied. After reasonable investigation, Debtor is without information sufficient to respond to this averment.
7. Denied. After reasonable investigation, Debtor is without information sufficient to respond to this averment.

8. Denied. After reasonable investigation, Debtor is without information sufficient to respond to this averment.
9. Denied. Legal conclusion to which no response is required.
10. Denied. Legal conclusion to which no response is required.

**WHEREFORE**, Debtor respectfully requests an Order of this Court denying the Motion of Village Capital & Investment, LLC for Relief from the Automatic Stay.

Respectfully Submitted,

**NEWMAN WILLIAMS, P.C.**

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